

CHRISTOPHER GARMON

I am a health economist with two professional passions: (1) helping decision-makers improve the well-being of health care consumers through research and analysis, and (2) giving students the skills and confidence to solve any problem they face. My areas of expertise include hospital, physician, and pharmaceutical competition and out-of-network medical billing.

EDUCATION

PhD	University of Florida, Economics	1997
BA	New College of Florida, Economics	1992

WORK EXPERIENCE

Assistant Professor of Health Administration 2017-Present

Department of Public Affairs
Henry W. Bloch School of Management
University of Missouri Kansas City

- I teach the core statistics course for the Master of Public Administration (MPA) program and teach health administration electives within the MPA, MBA, and undergraduate business administration programs. All of my courses are in a blended online format.
- I conduct research on health care provider competition and medical billing.
- Courses: Data Analysis for Health Care Managers, Economics of Health and Medicine, Health and Social Equity, Research Methods for Public Administration

Senior Consultant 2017-Present

Compass Lexecon

- I advise clients on health care antitrust issues.

Economist 1997-2017

Federal Trade Commission

- I conducted microeconomic analyses of mergers and other potential antitrust violations and advised the Commission about the social costs and benefits of proposed enforcement actions.
- I led teams of economists and analysts in numerous full phase antitrust investigations and litigations (e.g., PinnacleHealth and Penn State Hershey, CSL/Talecris, Capella Healthcare/Mercy Hot Springs, Inova Health/Prince

- William Hospital, Evanston Northwestern Healthcare and Highland Park Hospital, Libbey and Anchor Hocking).
- I served as the Bureau of Economics' primary staff-level liaison to other federal agencies and organizations on issues of health care policy and provider competition.
 - I helped the FTC and the Department of Justice's Antitrust Division write guidelines for the antitrust review of Accountable Care Organizations established by the Patient Protection and Affordable Care Act.
 - I served as the FTC's testifying economic expert in the FTC's challenge of the acquisition of Palmyra Medical Center by Phoebe Putney Health System and my analysis was cited by the Solicitor General when the case was argued before the Supreme Court.
 - I developed and led health care data privacy and security training for the FTC, including HIPAA compliance and the proper handling of large, patient-level datasets.

Instructor 2002-2011

Johns Hopkins University

- I taught the course Economics of Industry and Public Policy in JHU's Masters of Applied Economics program. I was recognized for excellence in teaching in 2007.

Visiting Assistant Professor of Economics 2000-2001

Kenyon College

- I taught the following courses: Environmental Economics, Industrial Organization, Principles of Macroeconomics and International Trade, and Principles of Microeconomics and Public Policy.

Instructor 1996

University of Florida

- I taught the course Managerial Economics in the Warrington College of Business.

Assistant Director 1996-1997

Center for Economic Education

University of Florida

- I led economics training programs and provided teaching materials to K-12 teachers.

RESEARCH AND PUBLICATIONS

(Corresponding author is first author, except where noted)

Working Papers

Schmidt D, Chen V, **Garmon C**, and Rios K, "[The Competitive Efficacy of Divestitures: An Empirical Analysis of Generic Drug Markets](#),"
Revise and resubmit: *Review of Economics and Statistics*.

Garmon C, Biener A, Chartock B, Duffy E, and Trish E, "[The Impact of the No Surprises Act on Physician-Insurer Negotiations](#),"

Xu W, **Garmon C**, Retchin S, and Li Y, "The Impacts of State Ground Ambulance Balance Billing Regulations on Pricing,"
Under review: *Health Services Research*.

Garmon C, Li Y, Retchin S, and Xu W, "[The Impact of Surprise Billing Laws on Emergency Services](#),"
Under review: *Journal of Health Economics*

Garmon C, Li Y, Retchin S, and Xu W, "The Impact of Surprise Billing Laws on Hospital-Based Physician Prices and Network Participation"

Xu W, **Garmon C**, Retchin S, and Li Y, "Association Between State Surprise Billing Regulations and Pricing of Inpatient Neonatal Services"

Peer-Reviewed Journal Publications

Rosenbaum T, Brand K, and **Garmon C**, "[In the Shadow of Antitrust Enforcement: Price Effects of Hospital Mergers from 2008-2016](#),"
Journal of Law and Economics, Forthcoming

Garmon C and Bhatt K, "[Certificates of Public Advantage and Hospital Mergers](#)," *Journal of Law and Economics*, v65 (#3, August 2022) pp.465-486

- Cited by the Federal Trade Commission in its staff policy paper, "[FTC Policy Perspectives on Certificates of Public Advantage](#)," August 15, 2022

Duffy E, Biener A, **Garmon C**, and Trish E, "[A Comparison of Estimated No Surprises Act Qualifying Payment Amounts and Payments to In-Network and Out-of-Network Emergency Medicine Professionals](#)," *JAMA Health Forum*, v3 (#9, 2022) pp.e223085

Park J, **Garmon C**, and Chung T, "[Utilization of Decision Theory and Decision Trees to Make Treatment Choices for Postoperative Reirradiation for Recurrent Head and Neck Cancer](#)," *Applied Radiation Oncology*, v11 (#2, June 2022) pp.35-39

Garmon C, "[Hospital Concentration and Bed Capacity](#)," *Applied Economics Letters*, v29 (#6, 2022) pp.551-554

Barrette E, **Garmon C**, and Kennedy K, "[Association Between Hospital-Insurer Contract Structure and Hospital Performance](#)," *American Journal of Managed Care*, v27 (#6, June 2021)

Biener A, Chartock B, **Garmon C**, and Trish E, "[Emergency Physicians Recover a Higher Share of Charges When Providing Out-of-Network Care](#)," *Health Affairs*, v40 (#4, April 2021) pp.622-628

- Media Coverage: [Healthcare Dive](#), [Wall Street Journal](#)
- Cited by the Centers for Medicare and Medicaid Services in its [Fact Sheet](#) on the Part 1 Interim Final Rule for the implementation of the No Surprises Act, July 1, 2021

Chartock B, **Garmon C (corresponding author)**, and Schutz S, "[Consumers' Responses to Surprise Medical Bills in Elective Situations](#)," *Health Affairs*, v38 (#3, March 2019) pp.425-430

- Media Coverage: [Kaiser Health News](#), [Philadelphia Inquirer](#), [UPI](#), [Pittsburgh Tribune](#), [Fierce Healthcare](#)

Garmon C and Kmitch L, "[Hospital Mergers and Antitrust Immunity: The Acquisition of Palmyra Medical Center by Phoebe Putney Health](#)," *Journal of Competition Law and Economics*, v14 (#3, September 2018), pp. 433-466

- Media Coverage: [New York Times](#)

Garmon C, "[The Accuracy of Hospital Merger Screening Methods](#)," *The RAND Journal of Economics*, v48 (#4, Winter 2017), pp. 1068-1102

Peer-Reviewed Publications Prior to UMKC:

Garmon C and Chartock B, "[One-in-Five Inpatient Emergency Department Cases May Lead to Surprise Bills](#)," *Health Affairs*, v36 (#1, January 2017), pp. 177-181

- Media Coverage: [New York Times](#), [Washington Post](#), [Houston Chronicle](#), [Dallas News](#), [Healthcare Dive](#), [Vox](#), [Other news coverage](#)

Garmon C, "[Major League Baseball's First Year Player Draft: A Natural Laboratory for the Study of Bargaining](#)," *Journal of Sports Economics*, v14 (#5, October 2013), pp. 451-470

Garmon C, "[Employer-Provided Health Insurance and Hospital Mergers](#)," *Health Economics, Policy and Law*, v8 (#3, July 2013), pp. 365-384

Haas-Wilson D and **Garmon C**, "[Hospital Mergers and Competitive Effects: Two Retrospective Analyses](#)," *International Journal of the Economics of Business*, v18 (#1, February 2011), pp. 17-32

- Awarded First Prize as the best published retrospective analysis of mergers by the American Bar Association, Section of Antitrust Law (2013)
- Selected as one of 20 papers to celebrate the 20th anniversary of the International Journal of the Economics of Business (2013)

Garmon C and Haas-Wilson D, "[The Use of Multiple Control Groups and Data Sources as Validation in Retrospective Studies of Hospital Mergers](#)," *International Journal of the Economics of Business*, v18 (#1, February 2011), pp. 41-44

Garmon C, "[Hospital Competition and Charity Care](#)," *Forum for Health Economics and Policy*, v12 (#1, May 2009)

Salinger M, Anderson K, **Garmon C**, Schmidt D, and Yun J, "[Economics at the FTC: Data Intensive Mergers and Policy R&D](#)," *Review of Industrial Organization*, v29 (#4, December 2006), pp.327-348

Garmon C, "[A Note on Negligence and Collusion-Proof Liability](#)," *International Review of Law and Economics*, v25 (#2, June 2005), pp. 256-263

Garmon C, "[Complements Integration and Foreclosure: The Case of Joint Consumption](#)," *Southern Economic Journal*, v70 (#4, April 2004), pp. 893-904

Other Publications

Garmon C, "Hospital Mergers - Retrospective Study to Improve Prediction," *Competition Policy International Antitrust Chronicle*, July 2017

Brand K and **Garmon C**, "Hospital Merger Simulation," American Health Lawyers Association Member Briefing, January 2014

Balbach J and **Garmon C**, "Competition in Hospital Services: United States,"

Submission to the Competition Committee, Directorate for Financial and Enterprise Affairs, Organization for Economic Cooperation and Development, February 2012

Wrobleski M, Jex E, Munck SD, **Garmon C**, Michel S, Wantman A, and Neal O, "[Emerging Health Care Issues: Follow-on Biologic Drug Competition](#)," Federal Trade Commission Report, June 2009

Balan D and **Garmon C**, "A Critique of the 'Learning About Demand' Defense in Retrospective Merger Cases," American Bar Association Antitrust Economics Newsletter, (Fall 2008), pp. 5-10

Averitt N, Balto D, **Garmon C**, Cohen W, DeSanti S, and Nagata E, "Report on Slotting Allowances and Other Marketing Practices in the Grocery Industry," Federal Trade Commission Report, February 2001

Lewis T and **Garmon C**, "Fundamentals of Incentive Regulation," PURC/World Bank International Training Program on Utility Regulation and Strategy, June 1997

Blogposts

Garmon C and Chartock B, "[In Through the Out Door: A Comprehensive Look at Surprise Medical Bills](#)," RealClearHealth, January 9, 2017

Brand K, **Garmon C**, and Gaynor M, "Reference Pricing is Not a Substitute for Competition in Health Care," FTC Competition Matters Blog, September 22, 2014

HONORS AND AWARDS

Award for Distinguished Service, FTC 2017
"In grateful recognition of your long distinguished service to the Commission and its Bureau of Economics. Your dedication to the FTC's 'maintaining competition' mission, your insightful analysis of antitrust issues, and your outstanding research in the area of hospital competition have greatly helped the Commission advance the public interest."

Francis Walker Award, FTC 2013
"In recognition of your outstanding intellectual and analytical contributions to a wide range of complex economic issues arising in the Federal Trade Commission's maintaining competition mission"

Janet Steiger Team Award, FTC Phoebe Putney/Palmyra Litigation Team	2013
First Prize, American Bar Association, Section of Antitrust Law The best published retrospective analysis of mergers	2013
Janet Steiger Team Award, FTC Hospital Merger Litigation Team	2012
Janet Steiger Team Award, FTC CSL/Talecris Investigation Team	2009
Janet Steiger Team Award, FTC Inova/Prince William Investigation Team	2008
Excellence in Teaching Award, Johns Hopkins University	2007
Paul Rand Dixon Award, FTC "In recognition for your outstanding analytical and empirical contributions in support of FTC activity in the hospital industry"	2006
Rafael Lusky Award, University of Florida The best first-year graduate economics student	1994

GRANTS

Investigating Effects of State Surprise Billing Regulations on Commercial Insurance Plan Enrollees, Robert Wood Johnson Foundation's Health Data for Action (HD4A) program, 2021-2022

Professional MBA Instructional Development Grant, Bloch Family Foundation, 2020

TEACHING EXPERIENCE

(Overall effectiveness based on student evaluations answering the question "Overall the instructor was effective," answers 1-5 with 5 = "Strongly Agree")

University of Missouri Kansas City	2017 to Present
<ul style="list-style-type: none"> • Certified for online instruction • Data Analysis for Health Care Managers <ul style="list-style-type: none"> ○ Developed in 2019 	

- Online certified and offered in a blended online format
- Elective for the Business Analytics Certificate and Certificate in Health Leadership
- Overall effectiveness (Mean (95% CI)) = 4.71 (4.21, 5.22)
- Economics of Health and Medicine
 - Online certified and offered in a blended online format
 - Elective for the Certificate in Health Leadership
 - Overall effectiveness (Mean (95% CI)) = 4.42 (4.05, 4.79)
- Health and Social Equity
 - Online certified and offered in a blended online format
 - Elective for the Certificate in Health Leadership
 - Overall effectiveness (Mean (95% CI)) = 4.50 (4.21, 4.79)
- Research Methods for Public Administration
 - Online certified and offered in a blended RooFlex (in-person and online) format
 - Required for Master of Public Administration
 - Overall effectiveness (Mean (95% CI)) = 4.65 (4.54, 4.76)
- The Healthcare Market, Saint Luke's Health System Executive Education, June 2018
 - Overall effectiveness (Mean) = 4.6
- Dissertation Committees:
 - Leah LaFever iPh.D., Education/Public Affairs, UMKC
 - Alison Park iPh.D., Public Affairs/Health Informatics, UMKC
 - Will Duncan Ph.D., Economics, University of Kansas

Johns Hopkins University

2002 to 2011

- Economics of Industry and Public Policy
- Recognized for excellence in teaching (2007)

Kenyon College

2000 to 2001

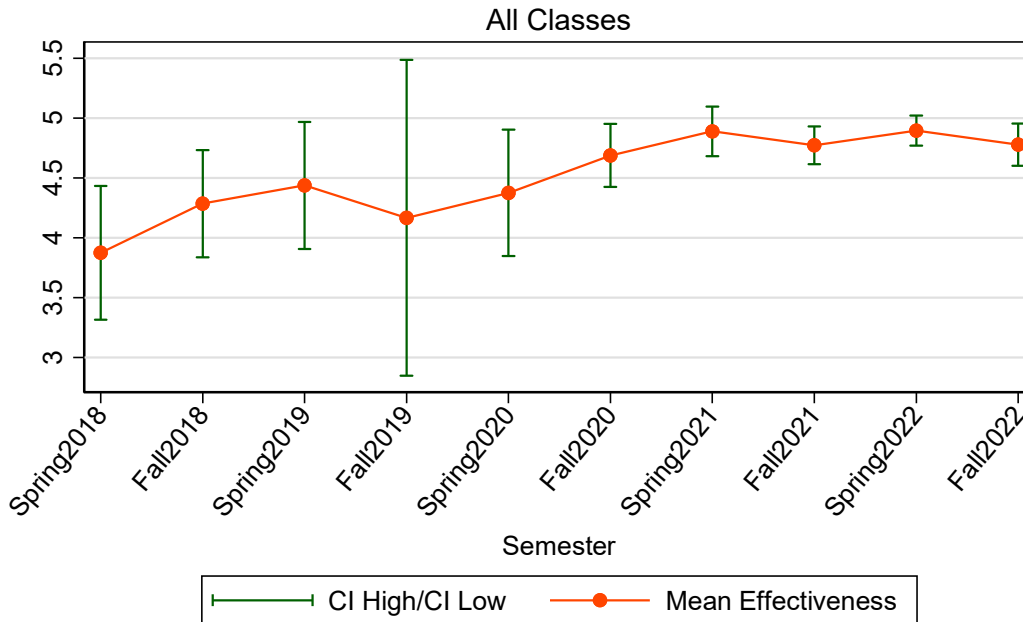
- Environmental Economics
- Industrial Organization
- Principles of Macroeconomics and International Trade
- Principles of Microeconomics and Public Policy

University of Florida

1996

- Managerial Economics

Chris Garmon Overall Teaching Effectiveness



Q: Overall the instructor was effective (1-5, with 5 as strongly agree)

PRESENTATIONS AND INVITED LECTURES

The Impact of Surprise Billing Laws on Emergency Services

- American Society of Health Economists Conference, St. Louis, MO, June 2023

The Impact of the No Surprises Act on Physician-Insurer Negotiations

- Missouri Valley Economics Association Conference, Kansas City, MO, October 2021
- American Society of Health Economists Conference, Austin, TX, June 2022
- Federal Reserve Bank of Kansas City RDC Annual Research Conference, Kansas City, MO, September 2022

The No Surprises Act and State Surprise Billing Laws

- National Council of Insurance Legislators Conference, April 2021

The Financial Burden of Surprise Medical Bills

- Kansas Virtual Health Economics Conference, March 2020

Certificates of Public Advantage and Hospital Prices: Evidence from Montana and South Carolina

- Association of Public Policy and Management Fall Research Conference, Denver, CO, November 2019

Surprise Out-of-Network Medical Bills

- Next Steps in Health Reform, American University, Washington, DC, October 2019

The Benefis Healthcare Certificate of Public Advantage

- Federal Trade Commission Workshop: A Health Check on COPAs: Assessing the Impact of Certificates of Public Advantage in Healthcare Markets, Washington, DC, June 2019
- Missouri Valley Economic Association Conference, Memphis, TN, November 2018

Surprise Medical Bills and the Potential Impact of Legislative Proposals

- HFMA Wisconsin Spring Conference, Appleton, WI, May 2019

Hospital Merger Retrospectives and Prospective Merger Analysis

- Federal Trade Commission Hearings on Competition and Consumer Protection in the 21st Century, Hearing 13: Merger Retrospectives, Washington, DC, April 2019

Consumer Response to Surprise Medical Bills in Elective Situations

- American Society of Health Economists Conference, Atlanta, GA, June 2018
- University of Missouri Kansas City Law School Seminar, March 2018
- University of Kansas Economics Department Seminar, Lawrence, KS, February 2018
- Southern Economic Association Conference, Tampa, FL, November 2017
- Missouri Valley Economic Association Conference, Kansas City, MO, October 2017

Hospital Mergers and Antitrust Immunity

- Kansas State University Economics Department Seminar, Manhattan, KS, April 2018

Health Care Competition or Regulation: The Unusual Case of Albany Georgia

- International Industrial Organization Conference, Boston, MA, April 2017

Hospital Merger Analysis

- National Association of Attorneys General, Health Care Working Group Webinar, January 2017

Efficiencies in Health Care Antitrust

- American Bar Association/American Health Lawyers Association Antitrust in Healthcare Conference, Arlington, VA, May 2016

The Accuracy of Hospital Merger Screening Methods

- RAND Health, Arlington, VA, June 2016
- DC Industrial Organization Conference, Washington, DC, April 2016
- FTC Microeconomics Conference, Washington, DC, October 2014
- International Industrial Organization Conference, Chicago, IL, April 2014
- Kenyon College, February 2014

Market Definition in Horizontal Health Care Provider Mergers

- American Bar Association/American Health Lawyers Association Antitrust in Healthcare Conference, Arlington, VA, May 2014

Diagnosing Retrospective Studies in Hospital Merger Enforcement

- American Bar Association Webinar, April 2014

Hospital Merger Forecasting: Lessons from the Retrospectives and Next Steps

- American Bar Association Retrospective Analysis of Agency Determinations in Merger Transactions Symposium, Washington, DC, June 2013

Merger Review Under the New Horizontal Merger Guidelines: Physician and Hospital Market Definition

- American Bar Association Antitrust in Healthcare Conference, Arlington, VA, May 2012

The Effects of Entry in Biologic Pharmaceutical Markets

- International Industrial Organization Conference, Arlington, VA, March 2012

The Role of Economic Analysis in Healthcare Antitrust: Cutting-Edge Economics Meets the Anomalies of the Healthcare System

- Antitrust Practice Group Mid-Year Luncheon, American Health Lawyers Association, Orlando, FL, February 2012

Major League Baseball's Rule 4 Draft

- Southern Economic Association Conference, Atlanta, GA, November 2010

Two Hospital Mergers on Chicago's North Shore: A Retrospective Study

- Southern Economic Association Conference, Atlanta, GA, November 2010
- International Industrial Organization Conference, Boston, MA, April 2009

Employer-Provided Health Insurance and Hospital Mergers

- American Society of Health Economists Conference, Durham, NC, June 2008

- International Industrial Organization Conference, Arlington, VA, May 2008
- Midwest Economic Theory Conference, Lansing, MI, April 2006

Hospital Competition and Charity Care

- Petrie-Flom Center for Health Law Policy, Harvard Law School, Boston, MA, April 2007
- American Society of Health Economists Conference, Madison, WI, June 2006

Complements Integration and Foreclosure: The Case of Joint Consumption

- Southern Economic Association Conference, Washington, DC, November 2000

PROFESSIONAL TRAINING

Faculty Certification in Online Teaching and Learning

- UMKC, April 2018

Python for Social Science Research

- Sage Campus, July 2018

Designing Student-Centered Courses

- Association of College and University Educators, July 2021

PROFESSIONAL AFFILIATIONS

American Economic Association
 American Society of Health Economists
 Missouri Valley Economic Association

PROFESSIONAL SERVICE

Panel Moderator

- The Economics of Hospital Competition, FTC Microeconomics Conference, November 2012
- Personalized Medicine, FTC Microeconomics Conference, November 2011
- The Role of Primary Service Area (PSA) Shares, “Another Dose of Competition: Accountable Care Organizations and Antitrust,” Federal Trade Commission Workshop, May 2011

Reviewed Grants/Paper Proposals:

- Robert Wood Johnson Foundation’s Changes in Health Care Financing and Organization Initiative
- Robert Wood Johnson Foundation’s Policy-Relevant Insurance Studies

- Health Affairs "Consumerism and Health" Planning Meeting, May 2018

Peer-Reviewed Articles for:

- American Journal of Managed Care
- Annals of Internal Medicine
- Economic Inquiry
- Forum for Health Economics and Policy
- Health Affairs
- Health Care Management Science
- Health Economics
- International Journal of Health Economics and Management
- International Journal of Industrial Organization
- Journal of Health Economics
- Journal of Industrial Economics
- Journal of Law and Economics
- Journal of Political Economy
- Journal of Regional Science
- Journal of Regulatory Economics
- RAND Journal of Economics

INTERVIEWS

[BJC-St. Luke's Merger Could Mean Hospital Patients Pay More, Experts Say](#), St. Louis Public Radio, July 25, 2023

[How the New Surprise Billing Law is Working So Far](#), Policygenius, December 21, 2022

[As Upstate and Crouse Secretly Plan Merger, Hospitals Aim to Avoid Federal Oversight](#), Syracuse Post-Standard, July 31, 2022

[As Hospitals Sue Over Surprise Billing Ban, Healthcare Experts Ask Why](#), Healthcare Dive, February 1, 2022

Underpayment is Major Concern for EDs with New Surprise Billing Law, ED Management, v34(2, February 2022):17-20

[Surprise Medical Bill Ban Now in Effect: What to Do If You Get One](#), Healthline, December 31, 2021

[Are We Really Going to See the End of Surprise Medical Bills in 2022?](#), Healthline, July 22, 2021

[While Kansas Keeps Hospital Data Under Lock And Key, Colorado Helps Employers Dig Into Cost Of Care](#), KCUR, July 2, 2021

[Millions of Americans are Vulnerable to Surprise Medical Billing](#), Yahoo!Finance, June 10, 2021

[Five Questions About Surprise Medical Bills](#), UMKC Today, February 3, 2021

[Kansas Among Worst States for Surprise Medical Bills. Congress Just Banned Them](#), Kansas City Star, December 23, 2020

[Surprise Medical Bills Cost Americans Millions. Congress Finally Banned Most of Them](#), New York Times, December 22, 2020

[How a Bill that Helped Hospitals Merge Could Cost Patients](#), Texas Standard, December 8, 2020

[Health Insurers Have to Give Back 1.4 Billion and Kansans Get the Fattest Checks](#), KCUR, October 17, 2019

[MEDIC Bill Controversy Shines Light on High Ambulance Costs](#), Charlotte Talks on WFAE, October 3, 2019

[Surprise Medical Bills are Increasingly Common, Study Finds](#), Medscape, August 13, 2019

[Politicians Tackle Surprise Bills, but Not the Biggest Source of Them: Ambulances](#), New York Times, July 22, 2019

[Keeping Hospital Market Competitive is an Uphill Battle for FTC](#), Bloomberg Law, June 6, 2019

[President Trump Calls for End to Surprise Medical Bills](#), KCTV5 News, May 9, 2019

[Centene, Wellcare Union Likely to Raise Antitrust Concerns](#), Healthcare Dive, March 29, 2019

[More Than 40 Employees Laid Off From Warrensburg Hospital Trying to Cut Costs](#), Fox4 News, February 6, 2018

OTHER ACTIVITIES

Technical Advisor to the U.S. District Court for the Western District of Pennsylvania in the matter of Royal Mile Company, Inc. et al. v. UPMC and Highmark, Inc. (2:2010cv01609), 2019

COMPUTER SKILLS

Course Management: Blackboard, Canvas

Mathematics: Wolfram Mathematica

Presentation: PowerPoint

Spreadsheet: Excel

Statistics & Data Management: Python, R, SPSS, Stata

Word Processing: LaTeX, Word

Video Editing: Panopto